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11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 AYNUR KABOTA, an individual,
14 Plaintiff,

15 vs.

16 EDUVISION, INC., dba ARIZONA
17 COLLEGE, a foreign corporation domiciled in
18 Missouri; SENTINEL PEAK CAPITAL, LLC,
19 dba ARIZONA COLLEGE, a Delaware
20 Limited Liability Company; DIANE
THOMASON, an individual; DANIEL J.
NAVARRO, an individual; PATRICIA T.
ALPERT, an individual; MARIE
HALLINAN, an individual,
Defendants.

CASE NO. 2:19-cv-01497-JAD-VCF

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR
DEFENDANT DANIEL J.
NAVARRO TO ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

[FIRST REQUEST]

21 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff AYNUR
22 KABOTA ("Plaintiff") and Defendant DANIEL J. NAVARRO ("Defendant NAVARRO"), by
23 and through their respective counsel of record Raelene K. Palmer of THE PALMER LAW FIRM,
24 P.C., and Bruce C. Young, Esq. of the law firm LEWIS BRISBOIS BISGAARD & SMITH LLP,
25 as follows:

26 Counsel for Defendant NAVARRO has only recently been retained to represent Defendant
27 NAVARRO in this matter. In light of the numerous allegations and causes of action set forth in
28

1 the Complaint against the several named defendants (including the currently represented
2 Defendants), as well as the need for counsel for Defendants to ethically determine if joint
3 representation of all of the named defendants is appropriate, an extension of time for Defendant
4 NAVARRO to answer or otherwise respond to the Complaint is necessary.

5 Based on the date of service, Defendant NAVARRO's response to Plaintiff's Complaint is
6 due on December 16, 2019. In order to allow counsel for Defendant NAVARRO sufficient time
7 to investigate the facts and prepare an appropriate response to the Complaint, the Parties have
8 agreed to stipulate to extend the time for Defendant NAVARRO to respond to Plaintiff's
9 Complaint until December 20, 2019.

10 This extension is not sought for any improper reason or for the purpose of delay.

11 DATED this 13th day of December, 2019. DATED this 13th day of December, 2019.

12 LEWIS BRISBOIS BISGAARD & SMITH LLP THE PALMER LAW FIRM, P.C.

13 By /s/ Bruce C. Young, Esq.

14 Bruce C. Young, Esq.
15 Paige S. Shreve, Esq.
16 6385 S. Rainbow Boulevard, Suite 600
Las Vegas, Nevada 89118
Attorneys for Defendants

By /s/ Raelene K. Palmer

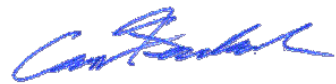
Raelene K. Palmer, Esq.
5550 Painted Mirage Road, Suite 320
Las Vegas, Nevada 89149
Attorneys for Plaintiff Aynur Kabota

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19 **[PROPOSED] ORDER**

20 Pursuant to the Stipulation of the Parties, and good cause appearing therefore:

21 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Defendant NAVARRO's
22 response to Plaintiff's Complaint shall be filed on or before December 20, 2019.

23 DATED this 13th day of December, 2019.

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26 UNITED STATES MAGISTRATE JUDGE
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